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Carol Hanlon
S&ER Products Manager
U. S. Department of Energy
Yucca Mountain Site Characterization Office
P.O. Box 30307 M/S 025
North Las Vegas, NV 89036-0707

RECEIVED

OCT 18 2001

Re: Yucca Mountain Preliminary Site Suitability Evaluation

Dear Ms Hanlon:

I offer the following comments regarding this document and the process in which it being handled by the DoE.

1. The document is premature. It offers recommendations based on cited documents which are incomplete or subject to legal action.

The Environmental Impact Statement for this project is not complete or finalized. The Draft EIS was the subject of many comments which have not been addressed publicly. Many of those comments dealt with the transportation of nuclear wastes from one site to another. Transportation routes have not been determined. Road improvement projects have not been addressed. Emergency preparedness and response is not being appropriately addressed. In light of recent terrorist events on US soil, the security of the shipments, much less the public, in event of attack has not been addressed.

The cited EPA regulations are subject of a lawsuit regarding their suitability and applicability. Thus, it is premature to evaluate the project in light of those standards.

2. It appears, from casual reading of the document, that the site *per se* is not suitable. The project is relying increasingly on the use of storage casks to contain the materials and prevent leakage of radioactive materials. This is a departure from the original mandate that a suitable site be found. The project is relying on designed devices rather than natural structures for containment.

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The combination of design mechanisms is thus subject to a variety of human errors, in design, in construction, in transportation, and in operations and maintenance. Based on past engineering scenarios, such as Three Mile Island, human error is something that needs careful consideration. Malfunctioning equipment was combined with human error to create a situation that was almost uncorrectable by human intervention.

The designed cask container appears to have an impressive design. However, the design team has apparently failed to test that cask under realistic design conditions. The tests appear to be geared for unique events, such as dropping only or submersion only. It is vital that the casks be tested for worst case scenarios where they are dropped from a considerable height and then submerged. They also need to be tested with conditions approaching a realistic scenario. While it may take a while for the radioactive spent fuel rods to affect the metallurgical integrity of the cask and welds (brittleness, creep, ductility, etc.), there is cause for concern here. If the casks are loaded and stored for a period of time before transport, the casks will be affected. This should be tested before approval of the cask design.

Should the cask prove to be as well designed as reports to the public would have us believe, it seems that the cask is something which can be used for on-site storage at locations where the fuel is used. The consumers should have to bear the cost, including health risks, of using that fuel. On-site storage would suffice until proper ultimate disposal is determined (see number 3 below). No matter how many games DoE or Congress plays with semantics, this is not ultimate disposal.

3. Although the DoE has a mandate to study this site, DoE should make known to Congress the need to explore proper ultimate disposal techniques. This project is makeshift at best. Instead of spending public funds on engineering design of casks for temporary storage (under the guise of permanent storage), funds should be expended on proper research for ultimate disposal. This was a topic of concern when I was in engineering school close to 30 years ago. We still have not made any progress on this issue.

4. The method of conducting hearings is suspect. This is a matter of national importance, especially in light of transportation issues not addressed by DoE in the EIS.

There has been only one public hearing scheduled in Clark County and part of that time was taken by teleconference from other sites. It was a month into the process before DoE scheduled hearings in all counties of Nevada (which were allowed at least two hearings each). The opportunity exists to make a statement to a public recorder for the official public record, but that is not the same as a public hearing, where people have a chance to comment in public, in front of others in the community.

The scheduling was suspect in Las Vegas by having a hearing which began at night. I signed up to make public contact, but was informed that I could not speak until after 2:00 am the next morning. Again, the public recorder was a useless gesture, because it would be a comment for the public record, but not a public comment.

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Until there is resolve on these issues, the United States should cease and desist from production of any additional fuel rods and seek alternate sources of energy.

The public and I await your response to these and all of our comments. Like the comments made regarding the Draft Environmental Impact Statement and the litigation surrounding the EPA regulations, they need to be addressed before the DoE can legitimately make a recommendation regarding the suitability of the Yucca Mountain site as an ultimate repository.

Regards,



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Office Manager
Nevada Desert Experience